

Appln No. 09/693,484  
Amdt. Dated November 12, 2000  
Reply to Office action of September 17, 2003

5

### REMARKS/ARGUMENTS

In response to item 11 of the Office Action the Applicant has inserted reference numerals into each of the claims. The reference numerals should not be taken as limiting to the scope of the features defined in the claims but are inserted to assist the Examiner in construing each of the terms in the claims.

Claim 1 is further amended to refer to "creating one or more serpentine members between neighboring island-defining portions...". Support for this amendment is found throughout the specification, for example, in the table on page 7 of the specification indicating use of one arm, two arm, three arm, or five arm serpentine members.

Claim 6 has been amended to address the Examiner's rejection under 35 USC §112. The Examiner has referred to claim 7, however, we assume that this is a typographical error and correctly refers to claim 6. In claim 6, "rigidity-reducing arrangements" has been deleted and replaced by "one or more serpentine members" to address the lack of antecedent basis on claim 1.

Under item 5 of the Office Action, the Examiner rejects claims 1 and 8 under 35 USC §102(b) as being anticipated by Grabbe (US 5,173,055). It is respectfully submitted that Grabbe does not anticipate the invention defined in claim 1 as Grabbe discloses a significantly different invention. Reconsideration and withdrawal of the rejection is respectfully requested in light of the following comments.

Grabbe seeks to address the problem that the substrate of a multi-chip module cannot support loading without deforming. Since chips are mounted on the opposite side of the substrate, the strain on the chips, due to the induced curvature of the deformed substrate, may be sufficient enough to damage them or their bonds (column 1, lines 18-23). Grabbe discloses use of elements 10 that are cut out of a sheet material. Each contact element 10 includes a pair of parallel cantilevered beams or resilient contact fingers 18 extending outwardly from one side or edge of plate 20 (column 2, lines 3-6). Furthermore, the invention disclosed in Grabbe utilizes a contact laminate 32 formed by attaching film 26 to sheet 12 with openings or windows 28 in registration with contact fingers 18 (column 2, lines 21-23). Contact elements 10 are required to be separated from each other by cutting

Appln No. 09/693,484  
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6

the temporary connections within the dashed circles 16 shown in Fig. 1 (column 2, lines 31-33).

The invention of Grabbe also requires depositing solder paste 38 on circuit board 40 in an array which corresponds to the array defined by contact element plates 20 and legs 22 on contact laminate 32. Laminate 32 is then position on board 40 (column 2, lines 39-43). Contact elements 10 are used to provide the interface for soldering where required and for the best metallurgy on contact fingers 18 (column 2, line 67 – column 3, line 2).

Attempting to cross-reference Grabbe to claim 1 of the present application, Grabbe does not disclose and is not directed to "an integrated circuit carrier", Grabbe is directed to connectors adapted to be attached to a circuit board 40. An integrated circuit is a sophisticated solid-state device very different to a circuit board. This difference in itself highlights the marked difference between the present invention as claimed in claim 1 and the disclosures in Grabbe.

Furthermore, Grabbe does not disclose the step of "demarcating at least one receiving zone for an integrated circuit", as Grabbe is silent on any means for receiving an integrated circuit. Again, it is highlighted that Grabbe applies to circuit boards as opposed to receiving integrated circuits. Still furthermore, Grabbe is wholly silent on a step of "creating one or more serpentine members". The contact elements 10 in Grabbe do not reduce thermal strains between island-defining portions as in present claim 1. As contact elements 10 protrude from the sheet material they cannot be construed as serpentine members between island-defining portions. The Applicant respectfully submits that Grabbe is largely irrelevant to the present invention as claimed in claim 1, and also dependent claim 8 which incorporates all the limitations of present claim 1.

The Examiner rejects claims 2-3 as being unpatentable over Grabbe in view of Theobald *et al.* (US 3,723,176), and also rejects, claims 6 and 9 as being unpatentable over Grabbe in view of Fukutomi *et al.* (US 6,568,073).

It is respectfully submitted that in light of the foregoing comments concerning Grabbe, claims 2, 3, 6 and 9 define patentable subject matter. Each of these dependent claims incorporates all of the limitations of claim 1. Grabbe cannot be construed as disclosing the

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7

features of claim 1 and no combination of Grabbe with either or both of Theobald *et al.* and Fukutomi *et al.* discloses or suggests all of the features of claim 1. Hence, neither do these prior art documents, either taken alone or in combination, disclose all the features of the dependent claims 2, 3, 6 or 9.

Pages 5 and 6 of the specification have been amended to insert omitted reference numerals (insulating layer 54 and circuitry layer 48).

### CONCLUSION

In view of the foregoing, it is respectfully requested that the Examiner reconsider and withdraw the rejections under 35 USC §112, 102 and 103. The present application is believed to be in condition for allowance. Accordingly, the Applicant respectfully requests a Notice of Allowance of all the claims presently under examination.

Very respectfully,

Applicant:



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